

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Bulk Chemicals - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: POLREP #3
Bulk Chemicals
A39M
Shoemakersville, PA
Latitude: 40.4712472 Longitude: -75.9717015

To: R3 RRC Response Center, USEPA
Kevin Boyd, EPA
Walter Bair, PADEP Emergency Response

From: Kelley Chase, On-Scene Coordinator

Date: 6/28/2019

Reporting Period: June 21, 2019 through June 28, 2019

1. Introduction

1.1 Background

Site Number:	A39M	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	EPA	Incident Category:	
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/10/2019	Start Date:	6/10/2019
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	6/10/2019
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency Removal Site Evaluation / Oversight of PRP Response

1.1.2 Site Description

The Site is an operating chemical manufacturing facility located in a residential neighborhood in Perry Township. The company, Bulk Chemicals, Inc., (BCI) has been operating at this location for over 40 years. BCI stores a variety of chemicals on-site which are used to produce industrial pretreatment chemicals and industrial metal cleaners. Many of the chemicals on-site are highly corrosive. Strong oxidizers and some flammable chemicals are also stored and used at the facility.

The Site is approximately one acre in size consisting of two large warehouse buildings located in close proximity to one another. The upper warehouse is generally used to store finished product in totes, drums and other containers. The lower warehouse is used for storage of raw materials in large tanks, totes, drums and other containers and for the production of various industrial chemical products. The lower warehouse was recently impacted by a nitric acid release and the a subsequent fire.

The lower warehouse contains, among other things, six or more large bulk storage tanks; six or more large process tanks; and three large waste water storage tanks. The nitric acid tank that spilled, possibly due to a failed gasket, has a capacity of about 4500 gallons. The warehouse has two large shelving rack systems that include up to five levels each. The facility stores various raw chemicals on these racks and on the floor. The containers on the racks, include 55-gallon steel and poly drums as well as other containers and bags of various raw materials. In addition, the warehouse is used to temporarily stage large 275-gallon totes containing various raw materials, finished materials as well as collected process waste water.

Currently, approximately 33 totes are estimated to be staged inside the warehouse; many are stacked at least two high; at least three of the totes are stacked three high. Many of the totes were damaged as a result of the nitric acid release. Several totes have leaked or are leaking which has created a highly corrosive atmosphere inside the building. The subsequent fire further damaged certain containers including at least one of the facility's waste water tanks and portions of the building. The electric service to the facility has been shut off.

1.1.2.1 Location

809 Mohrsville Road
Shoemakersville, Perry Township, Pennsylvania 19555

1.1.2.2 Description of Threat

On Sunday, June 9, 2019 the Shoemakersville Fire Company, Berks County Department of Emergency Services and the Pennsylvania Department of Environmental Protection (PADEP) responded to

a release of nitric acid at the BCI facility on Mohrsville Road in Shoemakersville, Perry Township. An estimated 2200 gallons of 62% nitric acid was released from a storage tank due to equipment failure. Nitric acid is highly corrosive and is a listed hazardous substance under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

The impacted nitric storage tank is located inside one of two large facility buildings (lower warehouse). The spill was not fully contained within the building and an unknown quantity of nitric acid was released to the ground at the facility. On Sunday, June 9, Berks County responders transferred the remaining nitric acid, approximately 2300 gallons, from the leaking storage tank to a competent holding tank within the same building, thereby preventing further release from the tank. BCI's contractors then began to conduct a cleanup of the facility. The following morning, Monday June 10th, a fire started in the lower warehouse which then compromised a waste water holding tank. The Shoemakersville Fire Company responded quickly. Once the fire was fully extinguished, BCI's contractors resumed cleanup activities to address the inside of the building and the release that occurred to the ground outside the building both as a result of the initial release of the nitric and the subsequent release from the damaged waste water tank and as a result of the firefighting efforts.

The majority of the totes stored in lower warehouse and at least one of the waste water storage tanks have been damaged and some are known to be leaking. The condition of other containers is largely unknown at this time. Conditions inside the building have prevented a complete assessment. The atmosphere inside the warehouse continues to be highly corrosive. These conditions are expected to lead to the ongoing degradation of containers stored in the building. Based on review of the facility's current inventories, many of the chemicals in the degraded totes and other containers stored on the racks are incompatible. Further degradation of the containers and to the racks may lead to further release of hazardous substances.

Residences are located adjacent to the Site to the north, south and west; there is an active railroad located adjacent to the facility the east; and the Schuylkill River is located about 200 feet to the west. Residents in the immediate area were asked to temporarily evacuate their homes during the initial release and again during the subsequent fire. The residents have since returned to their homes. There are ongoing concerns about the air quality and about whether private drinking water wells in the area were impacted.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Given the volume and nature of the chemicals remaining in the building and the conditions at the Site following the nitric release and subsequent fire, PADEP requested EPA's assistance. Since arriving on the scene on June 10, 2019, EPA and PADEP have been coordinating with local agencies and BCI to assess conditions at the facility and are overseeing stabilization and cleanup efforts being conducted by BCI and its contractors.

Upon arriving on-site late Monday, June 10th, EPA OSCs met with the facility owner and state and local officials. The OSCs, along with EPA Superfund Technical Assessment & Response Team (START) contractor representatives conducted an initial assessment of conditions at the facility and observed the response actions being conducted by the BCI's contractors. A significant amount of vapors were still emanating from lower warehouse. BCI's contractors were working to clean the floor inside the building. In an attempt to neutralize the acidic liquids (a mix of nitric acid, waste water and fire suppression water) remaining on the floor of the building, the contractors were applying a mix of soda ash and oil dry. The contractors were shoveling the material into poly drums.

Facility representatives indicated that in addition to their typical inventory, there were totes containing various chemicals stored inside, some of which contained incompatible materials. However, they did not have much information about the current condition of these totes. In addition, a second contractor arrived with a vacuum truck and pumped the nitric acid/waste water/fire suppression water mix that had been collected in a temporary containment just south of the building. PADEP officials worked with the facility and contractors to improve containment as rain water continued to accumulate in this area.

To obtain additional information, the START contractor conducted a limited assessment of the containers and conditions inside the lower warehouse. A team of two START contractors made a Level B entry into the building. The OSC requested and all parties agreed that no cleanup activities would be conducted during their entry. BCI's contractors entered the building with START to evaluate the current condition of the totes. It was not possible to conduct a complete assessment due to safety concerns. START was able to determine that approximately 33 totes were staged inside. Where possible, START collected information from labeling on the totes and documented the conditions of the totes that were readily accessible. START found that many of the totes were badly degraded and that several were leaking or appeared to have leaked their contents. The totes on the floor, which are expected to have been in direct contact with the nitric acid, were badly damaged and the metal cages were deteriorated. In some cases the stacked totes were leaning badly. In addition, some of the totes that were stacked higher up were also damaged. Based on the condition of the totes, BCI and its contractors determined they would not be able to be moved at that time.

Based on the initial assessment activities by EPA and START and overall observations of the ongoing response, the OSC expressed concerns to BCI owners regarding safety issues and the need to bring in additional resources before proceeding with additional activities. BCI officials were cooperative and work overnight to obtain additional resources.

On Tuesday, June 11, 2019, EPA mobilized additional resources to set up continuous air quality monitoring. Initial monitoring locations included the perimeter of the facility as well as locations closer to the building. EPA monitored for acid gases and for compounds that could result due to the nitric acid release that occurred including nitric acid, hydrogen fluoride, hydrochloric acid and oxidizers. Perimeter monitoring was also conducted for volatile organic compounds. Since continuous air quality monitoring began, all levels in outdoor monitoring locations both on the facility and in perimeter areas were within acceptable limits. Monitoring is also being conducted to evaluate conditions inside the lower warehouse.

2. Current Activities

2.1 Operations Section

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA and PADEP continue to oversee response efforts being conducted by BCI and its contractors. Contractors are working to address on-site conditions which pose a threat of release or further release of hazardous substances, pollutants or contaminants.

EPA is conducting continuous air quality monitoring within the facility both in and around the lower warehouse and in the neighboring residential community. Air monitoring parameters are modified, as needed, based on information obtained about the inventory of chemicals on-site and as potential and actual hazards change. Monitoring locations are adjusted as needed, based on current site conditions and operations. Monitoring conducted has included the three mineral acids nitric acid, hydrochloric acid, and hydrogen fluoride and other chemical compounds including hydrogen sulfide, hydrogen cyanide, ammonia, oxidizers and volatile organic compounds. Monitors outside the warehouse and in the community indicate acid gases and other chemical compounds are not being detected at actionable levels.

2.1.2 Response Actions to Date

All response actions are being conducted by BCI. Prior to EPA's arrival on-scene, BCI had obtained several contractors to conduct initial stabilization and cleanup activities. EPA arrived on-site late Monday, June 10, 2019. BCI brought in additional resources on June 11, 2019. Initial operations focused on improving access to the lower warehouse, removing remaining liquid from the floor of the building, stabilizing compromised totes and other containers impacted by the nitric release and subsequent fire.

Much progress has been made to stabilize conditions at the facility. All compromised totes and have been stabilized. Response contractors have conducted ongoing assessments of conditions inside the lower warehouse/plant and have provided regular updates and photos to BCI, PADEP and EPA. As anticipated, the photos show corrosion of equipment and any some of the stored containers due to the caustic conditions inside the warehouse. However, there are no signs of any new leakers or severely compromised containers at this time.

Lewis is doing a gross decon of the emptied totes and continuing to address the floor. EPA expects operations to shift to removing the remaining nitric acid from the open holding tank and also removing the nitric acid and other chemicals that remain on the floor of the building. Once these threats are mitigated, a comprehensive assessment of the inside of the lower warehouse and the containers and tanks in remaining in the warehouse will be conducted.

Site activities for this reporting period (June 11, 2019 through June 28, 2019) are summarized below.

6/11/19

- START checked pH levels around temporary containment area previously constructed on the exterior of the building near the south end of the property to contain site run-off: pH-4 inside containment area; pH- 6 near storm drain; pH-6 in former canal located between the road and the Schuylkill river.
- Overnight, First Call Environmental continued to conduct limited cleanup activities in an attempt to address the acidic liquids on the floor of the building.
- Miller Environmental pumped the liquid from the containment into a vacuum truck and transported it off site.
- Sioux Environmental collected potentially contaminated soil and solids from the containment and the adjacent ditch and storm water catchment and placed it in on on-site roll-off for future disposal. A new containment was constructed.
- The OSC requested air monitoring assistance from EPA's Environmental Response Team (ERT). EPA ERT and it's Scientific, Engineering, Response & Analytical Services (SERAS) contractor arrived and set up air quality monitoring. These resources were mobilized and set-up continuous air quality monitoring at the facility and on the perimeter.
- After arriving on-site and meeting with BCI, PADEP and EPA representatives, Lewis Environmental set up decon facilities and made a level B entry to assess current conditions inside the Lower Warehouse.
- Lewis found conditions inside the building to be highly corrosive and determined that the current conditions would require work be conducted in level A. Lewis collected two samples from the liquid on the floor of the building to help determine the appropriate equipment for stabilization and cleanup efforts. Samples we taken to the BCI lab for analysis. Lewis then left the Site to secure additional personnel, supplies and equipment.
- BCI working to improve site security and maintain road closures.

6/12/19

- ERT continuous air quality monitoring. Monitors outside the warehouse and in the community indicate acid gases and other chemical compounds are not being detected at actionable levels. START working to provide/maintain a figure of monitoring locations.
- Conducted site meetings with BCI and PADEP representatives. Primary objective was to determine the inventory and location of the various chemicals stored in the lower warehouse and to discuss concerns about possible incompatibles and high hazards. BCI indicated that nine of the "unknown" totes are likely untreated waste water. BCI indicated that seven 55- gallon drums of 49% HF are located near the north entrance of the building in an area that was not significantly impacted by the nitric acid release or the fire.
- BCI lab provided sample results for liquid samples collected from floor of lower warehouse.
- Lewis Environmental mobilized additional resources and setup support facilities.
- In an effort to improve access to the containers in the building, Lewis entered the building from the south entrance and began efforts to pump liquid nitric waste from the floor. Recovered liquid was pumped to two new 275-gallon totes. At the end of the day's operations, one tote was full; second had only a limited amount of liquid. Entries to the building were made in level A; decon team is in level B.
- Lewis improved the containment on south side of building due to threat of rain.
- START conducted air monitoring using Draeger Tubes (Acid Test & HCl) outside the exclusion zone. No compounds were detected above the lower detection limit of the tubes.

6/13/19

- ERT conducting continuous air quality monitoring perimeter sampling at 5 locations, and also at one interior location. Readings outside of the building remain within acceptable levels. START to provide/maintain a figure of monitoring locations.
- START continues monitoring outside the exclusion zone with Draeger tubes (Acid Test & HCl). No compounds were detected above the lower detection limit of the tubes.
- Discussion regarding high hazard materials currently stored within the lower warehouse took place.
- START checked pH levels of the rain water that collected in containment. All levels were neutral. EPA and PADEP agreed the water could be released. Lewis released the water to drain the containment area. Containment to be maintained as a precaution.
- Lewis continued to pump liquids from the floor of the building to totes located outside.
- Meeting with PADEP, Berks County, Shoemakersville Fire Company and BCI to discuss status of site operations and to agree on emergency response plans in the event of an emergency. FD provided an emergency radio to ensure communication in the event of an emergency. FD indicated that the Township has been receiving calls from concerned residents. OSC agreed to work to improve public communication efforts. OSC contacted CIC to discuss community concerns.

6/14/19

- EPA ERT monitors outside the warehouse and in the community indicate acid gases and other chemical compounds being monitored are not being detected at actionable levels.
- Lewis removed 5 HF drums (4-full, 1-½ full); 2 empty HF drums remain in the building. Lewis also removed Ferric Nitrate, Hydrogen Peroxide 50%, and Tergitol drums. Prior to moving, all drums were assessed and found to be intact and did not appear to have been directly impacted by the nitric release or fire. The drums were staged outside of the building and further inspected and then cleaned to remove any surface contamination. The drums were found to be competent and were later moved to the [REDACTED].
- Lewis continued pumping operations to improve access to the building. As liquid is removed, oil dry is being placed.
- START continues monitoring outside the exclusion zone (HF, HNO₃, HCl, and HCN) with Draeger tubes. No compounds were detected above the lower detection limit of the tubes.
- OSCs requested support from the USCG to oversee health and safety and medical monitoring.
- National Guard Civil Support team onsite to observe crew activities.
- EPA CIC finalized and distributed a fact sheet to the community to provide an update regarding site activities.

6/15/19

- EPA ERT monitors outside the warehouse and in the community indicate acid gases and other chemical compounds being monitored are not being detected at actionable levels.
- Perimeter fencing around site was set up to improve site security.
- Lewis conducted recon of lower warehouse and devised plan to stabilize certain totes. Efforts focused on the "L4" totes which were found to be stacked three high and were leaning on the racks.
- Lewis pumped out and transferred liquid from Tote 'L4 top' (Polyvinyl Alcohol Solution) to new tote; Tote 'L4 middle' (KOH water) was pumped out and transferred. Tote left in place in lower warehouse.
- Start continues monitoring outside the exclusion zone (HF, HNO₃, HCl, and HCN) with Draeger tubes. No compounds were detected above the lower detection limit of the tubes.

6/16/19

- ERT is currently conducting perimeter sampling at 8 locations, and also has one interior location set up. ERT monitors outside the warehouse and in the community indicate acid gases and other chemical compounds being monitored are not being detected at actionable levels.
- Lewis pumped out Tote 'R2 bottom' containing Nickel Nitrate Solution.
- Tote 'R2 top' containing Surfonic NP-95 leaked out onto floor and considered empty.
- Totes R1 and L5 containing N-methyl 2-pyrrolidone pumped out and bulked.
- Tote 'R3 top' previously unknown, classified as empty and removed.
- Start continues monitoring outside the exclusion zone (HF, HNO₃, HCl, and HCN) with Draeger tubes. No compounds were detected above the lower detection limit of the tubes.

6/17/19

- EPA ERT monitors outside the warehouse and in the community indicate acid gases and other chemical compounds being monitored are not being detected at actionable levels.
- START conducted private drinking water sampling at five adjacent residences. Preliminary results expected within a week.
- USCG Atlantic Strike Team on-site, per OSC's request, to assist with oversight of health and safety of operations, including oversight medical monitoring of Lewis Environmental crew. This includes the level A entry teams and the decon teams in level B. Heat stress is becoming more of a concern with the increased temperatures and humidity.
- Lewis continued pumping product from compromised totes from within the lower warehouse. Liquid was pumped to new totes which were then being moved to the upper warehouse. Once pumped out the damaged totes are being temporarily stored inside the lower warehouse.
- Tote 'R3 bottom' containing Bulk Draw 480RLX pumped out. Some solution was left in tote and will be pumped out on 6/18/19.
- Tote 'R4 top' containing Phosphoric acid pumped out.
- Tote 'R4 bottom' containing Fluotitanic acid 60% pumped out.
- Start continues monitoring outside the exclusion zone (HF, HNO₃, and HCN) with Draeger tubes. No

compounds were detected above the lower detection limit of the tubes.

- EPA, PADEP, BCI continue to work towards improving site controls and traffic controls to improve overall site safety for on-site personnel and the community. Flagger Force efforts in this regard have been inconsistent.

6/18/19

- Totes R5 Bottom (Hexafluorzirconic acid), R6 Top (Gluconic acid 50%), R6 Bottom (Sulfuric Acid 50%), L1 (S-97 HSU Solution), and L2 Top (liquid chromic acid) were all pumped and transferred to new containers.
- START conducted perimeter air monitoring using Draeger tubes for HCN, HF, and HNO₃; No compounds were detected above the lower detection limit of the tubes.
- Aloha models and reactivity models were updated based on changing site conditions.
- ERT continues to conduct continuous air monitoring in and around the warehouse and in the neighboring residential community. ERT monitoring locations remain the same. Monitors outside the warehouse and in the community indicate acid gases and other chemical compounds being monitored are not being detected at actionable levels.
- Drums of HF were moved off-site to BCI's Blanden warehouse, as discussed.
- Efforts to improve site controls, including traffic controls continue.

6/19/19

- START continued with perimeter air monitoring using Draeger tubes (HF, HCN, Nitric). No compounds were detected above the lower detection limit of the tubes.
- The hydrogen Peroxide drum, was removed from site and transported to the Blanden warehouse.
- The large intermodal tote "L6" (ammonium hydroxide) was removed and placed into storage in the upper warehouse. The remaining liquid in Tote R3 Bottom was pumped (Bulk Draw 480RLX); L7 bottom (glycol ether EB) was removed and pumped; L7 top (Gastal L-61) was removed and pumped, L-8 bottom (Arrow DISP W7512S) was removed and will be pumped 6/20/19, L-8 top identified as NAOH 50% began pumping and will be completed tomorrow.
- Chief Wagner, Shoemakersville Fire Company, on-site for an update regarding ongoing activities and to continue discussions regarding current site hazards and contingency planning in the event of an emergency.
- PADEP continues to assist with efforts to improve road closure signage to improve site control, traffic safety and overall public safety.
- EPA CIC is drafting an updated fact sheet for distribution on this Friday. Review is being coordinated with PADEP's community relations personnel.

6/20/19

- Tote L2 bottom was removed and pumped; L3 bottom leaked and the empty tote was removed; L3 top was pumped and removed; L4 bottom was pumped and removed. L9 bottom (Gastal 702) is scheduled to be pumped tomorrow; L8 bottom was pumped and removed.
- START continued monitoring the perimeter using Draeger tubes (HCN, HF, HNO₃). No compounds were detected above the lower detection limit of the tubes.
- ERT placed a SPM Flex for HF at the southern bay door (Location 9).
- START Updated Aloha model for 69% Nitric.
- Lewis collected 4 samples of material from the facility floor to be run in Bulk Chemicals lab.
- Flagger Force obtained additional signage and is working to improve site control and address traffic safety.
- EPA and PADEP plan to meet with Berks County HAZMAT tomorrow to provide an update regarding site stabilization efforts.

6/21/19

- Lewis pumped and transferred totes L9 top (Potassium hydroxide 45%), L9 bottom (Gastal 702), L10 top (Bulk Kleen 769), L10 bottom (E-CLPS 2101), and R9 top (Fluotitanic acid 60%). On Monday June 10th, START had found R9 to be full and leaking. However, Lewis was not able to access the tote until today. The tote was approximately half full, remaining contents transferred to a new tote.
- START continued perimeter air monitoring using Draeger tubes (HF, HCN, and HNO₃), no detections above the lower detection limit.
- Berks County HAZMAT was on-site to review progress.
- Initial IAP was finalized and provided to Fire Chief Wagner and Berks County HAZMAT.
- ERT continues to conduct continuous air quality monitoring in and around the warehouse and in the neighboring residential community. ERT added an additional SPM Flex at location 9 for HCN. Location 9 now monitoring for HF and HCN. Monitors outside the warehouse and in the community indicate acid gases and other chemical compounds being monitored are not being detected at actionable levels.
- EPA CIC delivered an updated community fact sheet to nearby residents. Additional fact sheets are being mailed.
- Flagger Force placed additional signage on Route 61 to improve traffic control.

6/22/2019

- Lewis pumped and transferred L11 bottom (NMP N-Methyl 2-Pyrrolidone), L11 top (wastewater) and picked are removed R7 (one drum of Bulk Bond 315MU and one drum of phosphoric acid).
- ERT conducting continuous air monitoring in and around the warehouse and in the neighboring community. ERT placed a SPM flex (HNO₃) in the NW corner of the Royal Trucking facility building; tubing runs up the side of the building. This is located southeast of the BCI facility and is identified as location 10. Monitors outside the warehouse and in the

community indicate acid gases and other chemical compounds being monitored are not being detected at actionable levels.

- Two totes of N-Methyl 2-Pyrrolidone (R1 and L5) have been relocated to BCI's Blandon Warehouse.
- START continued to air monitor the perimeter of the site using Draeger tubes (HF, HCN, and HNO₃) no detections.

6/23/19

- Lewis removed the contents of Rack 16 level 1, Potassium Ferric Cyanide and Sodium Fluoride were placed into individual poly drums. The Potassium Hexafluozirconate boxes were in good condition and remain in their original boxes, and the Potassium Fluoborate drum was also in good condition and remains in its original drum. Lewis also pumped and transferred totes L-13 top (2 drums of "floor sweepings" and L-13 bottom (wastewater).
- Lewis also identified two new totes of Chrome wastewater (Rack 11 level 1).
- Lewis pulled Draeger tubes in the building for HNO₃, HCN, and HF. No detections on the HF or HCN, which were pulled in the southern end of the building. The HNO₃ Draeger detected approximately 3ppm. The HNO₃ Draeger was pulled directly next to the open tank of HNO₃.
- START continued perimeter air sampling with Draeger tubes (HCN, HF, HNO₃) no detections.
- ERT conducting continuous air quality monitoring in and around the warehouse and in the neighboring community. Monitors outside the warehouse and in the community indicate acid gases and other chemical compounds being monitored are not being detected at actionable levels. ERT relocated the position of location 7 inside the upper warehouse. Air monitor was moved closer to the door.

6/24/19

- Lewis pumped and transferred the remaining wastewater totes R8 and R9 bottom. Lewis also pumped the chrome wastewater totes located at rack 11 level 1. All compromised totes have been addressed; primarily by transferring contents to new totes which were then staged in the upper warehouse.
- During an entry Lewis identified a possible minor leak possibly related to four 55-gallon drums of glycol ether EB. These drums are located on the second level of an unidentified rack. Lewis place a decon pool underneath to capture any leaking product.
- Lewis pulled more Draeger tubes for HNO₃ throughout the building and had no detections.
- START also continued air monitoring the site perimeter with HNO₃ Draeger tubes and also had no detections.
- ERT conducting continuous air quality monitoring in and around the warehouse and in the neighboring community. Monitors outside the warehouse and in the community indicate acid gases and other chemical compounds being monitored are not being detected at actionable levels.
- Discussed the need to transfer the nitric acid from the open top stainless process tank. Berks County HAZMAT had transferred more than 2000 gallons of nitric to the open tank from the leaking nitric tank on Sunday June 9th. The open tank was not intended for long-term storage. BCI looking to secure stainless totes appropriate for long-term storage. This is expected to help stabilize the atmosphere inside the building.
- BCI collected a soil sample from the southwestern edge of the facility along the road. The sample was analyzed in BCI's in-house lab. Total chrome was detected at a concentration of 52 ppm.
- Daily work schedule is being adjusted to start earlier (0600 and 0700), due to the heat.

6/25/19

- Lewis conducted recon of the inside of the lower warehouse. Recon shows that racks are in relatively good condition.
- Lewis collected more Draeger tubes from within the facility for HNO₃, no detections.
- ERT continues to conduct continuous air quality monitoring in and around the warehouse and in the neighboring community; acid gases and other chemical compounds being monitored are not being detected outside the warehouse or in the community at actionable levels.
- Exclusion zone has been reduced.
- To improve access within the lower warehouse, Lewis removed and conducted a gross decon of six empty totes and are staged them outside for future disposal. Decon water is being collected for future disposal.
- Lewis continues to apply oil dry to adsorb liquid on the floor of the lower warehouse.
- BCI secured seven 350-gallon stainless steel totes to transfer the remaining nitric acid (about 2000 gallons) from the open top process tank. Totes scheduled to be delivered next week.
- START received preliminary anion results for drinking water sampling. Results are below EPA MCLs. Awaiting results of metals analysis.

6/26/19

- Lewis continued to remove empty totes from the lower warehouse; the totes were given a gross decon and staged outside for future disposal (15 remain).
- Lewis conducted more site recon inside the building, videos and pictures indicate that drums on the racks appear to be in good condition. Identified some areas that will need more oil dry.
- Lewis continued to address liquid remaining on the floor of the lower warehouse by applying

oil dry to wet areas, as needed.

- ERT continues to conduct continuous air quality monitoring in and around the warehouse and in the neighboring community; acid gases and other chemical compounds being monitored are not being detected outside the warehouse or in the community at actionable levels. ERT placed a SPM for HNO₃ to the south of the facility.
- With conditions at the Site now more stable, it was decided no work will be conducted over the upcoming weekend (6/29 – 6/30) or over the 4th of July holiday weekend (from 7/4 - 7/7). ERT will maintain continuous air monitoring. The road will remain closed for this weekend. Flagger Force and site security will be on-site through the weekend. Expect to open the road, at least one lane, before the 4th of July holiday.
- PADEP met with Lewis to review disposal options for the different waste streams.
- EPA CIC is drafting a new fact sheet for distribution on Friday 6/28/19.

6/27/19

- Lewis conducted a gross decon of the remaining empty totes and staged them outside for future disposal.
- START received preliminary metals results for drinking water sampling. Results are below EPA MCLs. OSC reviewed results and provided to ATSDR for review. EPA CIC and OSC communicated results to individual residents.
- Updated IAP for next operational period and provided to Unified Command.
- Lewis removed several pallets from the 1st level of the racks and applied oil dry to the floor in these areas to address any remaining liquids.
- ERT continues to conduct continuous air quality monitoring in and around the warehouse and in the neighboring community; acid gases and other chemical compounds being monitored are not being detected outside the warehouse or in the community at actionable levels.
- EPA community update fact sheet was finalized; will be mailed to local residents.

6/28/19

- To improve access to the lower warehouse and the all floor areas in order to address any remaining nitric acid liquids, Lewis removed several pallets from the building and conducted a gross decon, as needed, and then relocated the materials to the upper warehouse. Nine 50lb bags of ammonium hydrogendifluoride, five 55lb bags of boric acid loaded into one drum, two drums of Cola Trope 522, two drums of Surmax CS-522, two drums of Nitric acid 42 BE, and one full pallet of titanium phosphate bags (25kg) have been relocated to the upper warehouse. One super sack of zinc oxide has slight damage to the bag; will be addressed and either relocated into the upper warehouse or staged back in the lower warehouse for the weekend.
- 1 bag of potassium ferricyanide, previously removed from the lower warehouse and staged in the upper warehouse, was taken to BCI's Blandon warehouse.
- Lewis will pull 2 samples for waste characterization; one from the roll-off and one from the facility floor.
- Site will be secured for the weekend. An emergency contact list for this weekend has been distributed.
- ERT continues to conduct continuous air quality monitoring in and around the warehouse and in the neighboring community; acid gases and other chemical compounds being monitored are not being detected outside the warehouse or in the community at actionable levels.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

EPA and PADEP continue to oversee response efforts being conducted by BCI and its contractors. Contractors are working to address on-site conditions which pose a threat of release or further release of hazardous substances, pollutants or contaminants. All compromised totes have been secured and removed from the lower warehouse. The contractor Current operations are focused on removing any addressing the floor of the warehouse. This includes removing any remaining liquids by pumping, where possible, and by applying oil dry. Once the remaining liquids are adsorbed, the material will be collected and sampled for disposal. EPA will continue to conduct air quality monitoring within the facility both in and around the lower warehouse and in the neighboring residential community until conditions are stabilized.

2.2.1.2 Next Steps

BCI has secured seven 350-gallon stainless steel totes; these should be delivered to the Site next week. The nitric acid remaining in the open top stainless process tank will be transferred to the stainless steel totes and moved to the upper warehouse.

2.2.2 Issues

At midnight on June 28, 2019, OSC Chase received a call from Shoemakersville Fire Chief Wagner who received a report from the on-site security regarding vapors emanating from the vent system on the lower warehouse. OSC Chase called Mike Hoppe of EPA ERT. Chase and Hoppe responded and met the Chief and the owner of BCI on-site for a few hours into the early morning. No compounds of concern were detected on EPA air monitoring instrumentation prior to, during or after our response, but there were visible signs of vapors. Speculation was that the vapors were the result of ongoing reaction/neutralization from earlier Site activities. ERT has two on-Site cameras in place that provide some remote visualization capabilities. It is expected that these vapors may persist at night, depending on meteorological conditions.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

EPA, PADEP and BCI continue to maintain an on-site presence throughout operations. Berks County Department of Emergency Services and Shoemakersville Fire Company continue to provide support.

There continues to be a high level of cooperation amongst all parties as the efforts towards stabilizing conditions and mitigating the remaining threats continue.

3.2 Cooperating Agencies

Berks County Department of Emergency Services
Shoemakersville Fire Company
Perry Township
Ontelaunee Township, PA

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.